

ROBBINS GELLER RUDMAN
& DOWD LLP
WILLOW E. RADCLIFFE (200087)
MATTHEW S. MELAMED (260272)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
willowr@rgrdlaw.com
mmelamed@rgrdlaw.com

Liaison Counsel

LABATON SUCHAROW LLP
JOEL H. BERNSTEIN
MARK S. ARISOHN
CORBAN S. RHODES
140 Broadway
New York, NY 10005
Telephone: 212/907-0700
212/818-0477 (fax)
jberstein@labaton.com
marisohn@labaton.com
crhodes@labaton.com

GLANCY PRONGAY & MURRAY LLP
LIONEL Z. GLANCY (134180)
EX KANO S. SAMS II (192936)
ROBERT V. PRONGAY (270796)
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: 310/201-9150
310/432-1495 (fax)
lglancy@glancylaw.com
esams@glancylaw.com
rprongay@glancylaw.com

Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NORFOLK COUNTY RETIREMENT
SYSTEM, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

SOLAZYME, INC., et al.,

Defendants.

) Case No. 3:15-cv-02938-HSG

) CLASS ACTION

) STIPULATION AND ~~PROPOSED~~
) SCHEDULING ORDER

Pursuant to Civil Local Rule 7-12, the parties, Norfolk County Retirement System (“Norfolk”), John Medlin, John Hussain, Nancy Ackels and Leonardo Fernandez (collectively, “Solazyme Investors” or “Lead Plaintiffs”) and Solazyme, Inc. (“Solazyme”), Jonathan S. Wolfson, Tyler W. Painter, David C. Cole, Jerry Fiddler, Michael V. Arbige, Ian T. Clark, Peter Kovacs, James R. Craigie, Goldman, Sachs & Co. and Morgan Stanley & Co, LLC (collectively, “Defendants”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

WHEREAS, on September 4, 2015, the Court granted plaintiff Norfolk and Defendants’ Stipulation Extending Defendants’ Response Deadline Pending Appointment of Lead Plaintiff and Lead Counsel and Vacating Initial Case Management Conference. Dkt. No. 44;

WHEREAS, on October 8, 2015, the Court held a hearing on motions to appoint lead plaintiff and lead counsel and took such motion under submission. Dkt. No. 65;

WHEREAS, on October 8, 2015, the Court issued a written order granting the Solazyme Investors’ motion for appointment as Lead Plaintiff and approved its selection of Glancy Prongay & Murray LLP and Labaton Sucharow LLP to serve as co-Lead Counsel, as well as Robbins Geller Rudman & Dowd LLP to serve as Liaison Counsel. Dkt. No. 64; and

WHEREAS, the parties have met and conferred and Lead Plaintiffs have indicated that they intend to file an amended complaint.

The parties have further agreed on a schedule for the filing of such complaint, a date by which Defendants shall file a motion to dismiss or otherwise respond to the complaint, and in the event Defendants file a motion to dismiss, the parties have conferred and agreed on a briefing schedule which accommodates the complexity of this securities action and the parties’ and their counsel’s respective schedule.

NOW THEREFORE, the parties hereby agree and stipulate to the following deadlines and briefing schedule:

1. Lead Plaintiffs shall file an amended complaint no later than December 15, 2015;
2. Defendants’ response to the amended complaint shall be filed on or before February 12, 2016;

1 3. Lead Plaintiffs' opposition to Defendants' response shall be filed on or before March
2 25, 2016;

3 4. Defendants' reply shall be filed on or before April 22, 2016; and

4 5. The hearing on Defendants' anticipated motion to dismiss shall be set for May 12,
5 2016 at 2:00 p.m., or a date thereafter that is convenient for the Court.

6
7 DATED: November 5, 2015

ROBBINS GELLER RUDMAN
& DOWD LLP
WILLOW E. RADCLIFFE
MATTHEW S. MELAMED

8
9
10 s/ WILLOW E. RADCLIFFE
WILLOW E. RADCLIFFE

11
12 Post Montgomery Center
13 One Montgomery Street, Suite 1800
14 San Francisco, CA 94104
15 Telephone: 415/288-4545
16 415/288-4534 (fax)

Liaison Counsel

17 LABATON SUCHAROW LLP
18 JOEL H. BERNSTEIN
19 MARK S. ARISOHN
20 CORBAN S. RHODES
21 140 Broadway
22 New York, NY 10005
23 Telephone: 212/907-0700
24 212/818-0477 (fax)

25 GLANCY PRONGAY & MURRAY LLP
26 LIONEL Z. GLANCY
27 EX KANO S. SAMS II
28 ROBERT V. PRONGAY
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: 310/201-9150
310/432-1495 (fax)

Co-Lead Counsel for Plaintiffs

1 DATED: November 5, 2015

MORRISON & FOERSTER LLP
JORDAN ETH (CA SBN 121617)
MARK R.S. FOSTER (CA SBN 223682)

3
4 s/ MARK R.S. FOSTER

MARK R.S. FOSTER

5 425 Market Street
6 San Francisco, CA 94105
7 Telephone: 415/268-6335
8 415/268-7522 (fax)
9 jeth@mofo.com
10 mfooster@mofo.com

11 Attorneys for Defendants Solazyme, Inc.,
12 Jonathan S. Wolfson, Tyler W. Painter, David C.
13 Cole, Jerry Fiddler, Michael V. Arbige, Ian T.
14 Clark, Peter Kovacs and James R. Craigie

12 DATED: November 5, 2015

SIMPSON THACHER & BARTLETT LLP
JAMES G. KREISSMAN (Bar. No. 206740)
SIMONA G. STRAUSS (Bar No. 203062)

15 s/ JAMES G. KREISSMAN

JAMES G. KREISSMAN

16 2475 Hanover Street
17 Palo Alto, CA 94304
18 Telephone: 650/251-5000
19 650/251-5002 (fax)
20 jkreissman@stblaw.com
21 sstrauss@stblaw.com

22 Attorneys for Defendants Goldman, Sachs & Co.
23 and Morgan Stanley & Co., LLC

23 I, Willow E. Radcliffe, am the ECF User whose ID and password are being used to file this
24 Stipulation and [Proposed] Scheduling Order. In compliance with Civil Local Rule 5-1(i)(3), I
25 hereby attest that Mark R. S. Foster and James G. Kreissman have concurred in this filing.

26 s/ WILLOW E. RADCLIFFE


WILLOW E. RADCLIFFE

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 11/9/2015


THE HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 5, 2015.

s/ WILLOW E. RADCLIFFE
WILLOW E. RADCLIFFE

ROBBINS GELLER RUDMAN
& DOWD LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: willowr@rgrdlaw.com